

Decision 16-06-050 June 23, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider
Alternative-Fueled Vehicle Programs,
Tariffs, and Policies.

Rulemaking 13-11-007
(Filed November 14, 2013)

And Related Matter.

Application 14-04-014

**DECISION GRANTING INTERVENOR COMPENSATION TO THE NATIONAL
ASIAN AMERICAN COALITION FOR SUBSTANTIAL
CONTRIBUTION TO DECISION 16-01-045**

Intervenor: National Asian American Coalition (NAAC)	For contribution to Decision (D.) 16-01-045
Claimed: \$126,118.00	Awarded: \$115,581.50
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: John S. Wong

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision (D.) 16-01-045 authorizes a pilot program to test the effect of increased availability of electric vehicle charging stations upon the market demand for electric vehicles in the San Diego area, as well as test the ability of a dynamic pricing model to shift peak demand times on the grid. The decision rejects the proposed settlement which the National Asian American Coalition (NAAC) also opposed, substantially reduces the overall cost and size of the pilot program, and incorporates special provisions for disadvantaged communities in line with NAAC recommendations.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in
Pub. Util. Code §§ 1801-1812:**

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	8/13/2014	Verified.
2. Other specified date for NOI:	--	
3. Date NOI filed:	08/25/2014	Verified.
4. Was the NOI timely filed?		Yes, The National Asian American Coalition (NAAC) timely filed the notice of the intent to claim intervenor compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.13-11-003	Verified.
6. Date of ALJ ruling:	4/18/2014	Verified.
7. Based on another CPUC determination (specify):	--	
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, NAAC demonstrated appropriate status.
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.13-11-003	Verified.
10. Date of ALJ ruling:	4/18/2014	Verified.
11. Based on another CPUC determination (specify):	--	
12. Has the Intervenor demonstrated significant financial hardship?		Yes, NAAC demonstrated significant financial hardship.

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-01-045	Verified.
14. Date of issuance of Final Order or Decision:	02/04/2016	Verified.
15. File date of compensation request:	04/04/2016	Verified.
16. Was the request for compensation timely?		Yes, NAAC timely filed the request for intervenor compensation.

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><u>Rejection of Proposed Settlement</u></p> <p>The Joint Minority Parties (JMP) participated in settlement discussions and ultimately found the terms offered by SDG&E to be insufficient. The JMP advocated for the rejection of the proposed settlement, arguing among other points that the proposed settlement program was unreasonable in cost and size, contained insufficient provisions for disadvantaged communities, and did not adequately target multi-unit dwellings (MUDs.)</p> <p>The final Decision rejected the settlement agreement, and incorporated terms into the Alternative VGI Program (AVP) in line with JMP recommendations.</p>	<p><i>Comments of Joint Minority Parties in Opposition to the Joint Motion for Adoption of Settlement Agreement of San Diego Gas & Electric Company and the Settling Parties, (7/3/2015) ("JMP Comments on Settlement") at 2, 5.</i></p> <p><i>Reply Comments of Joint Minority Parties to the Joint Motion for Adoption of Settlement Agreement of San Diego Gas & Electric Company and the Settling Parties, (7/20/2015) ("JMP Reply on Settlement") at 2, 3, 6.</i></p> <p><i>Decision Regarding Underlying Vehicle Grid Integration Application and Motion to Adopt Settlement Agreement, D.16-01-045, (2/4/2016) ("Decision") at 66, 67, 123.</i></p>	Verified.

<p><u>Reduction in Program Size, Cost, and Duration</u></p> <p>The JMP consistently called for a reduction in the Original and Proposed Vehicle-Grid Integration (VGI) programs' cost, size, and duration, arguing that a scaled down, focused pilot program was necessary and reasonable to test impact of the novel VGI rate and increased Electric Vehicle Supply Equipment (EVSE) availability on Electric Vehicle (EV) adoption and grid load. The JMP repeatedly argued that there were unknown benefits from increased charging infrastructure, substantial risks that future developments in clean energy vehicle and charging technology would render VGI program equipment obsolete, and utility ownership of substantial EVSE could be anti-competitive for third party providers. The JMP also raised concerns that the cost of the Original and Proposed VGI programs would not provide meaningful benefits to ratepayers, especially low-income ratepayers in disadvantaged communities (DACs.)</p> <p>The Decision echoes the concerns of the JMP that charging stations should not be extensively deployed while EV technology is still evolving, that the overall costs were too high for a pilot program, and that the costs were too</p>	<p>JMP Comments on Settlement at 3.</p> <p><i>Opening Brief of the Joint Minority Parties</i> (9/4/2015) (JMP Opening Brief (OP)) at 4, 5, 6</p> <p><i>Reply Brief of the Joint Minority Parties</i> (9/18/2015) (JMP Reply Brief) at 2-4</p> <p>Decision at 66, 102, 118, 121, 122, 127.</p>	<p>Verified.</p>
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<p>burdensome on ratepayers in light of the projected benefits. The Decision imposed substantial reductions to size, cost and duration in the AVP.</p>		
<p><u>Requirement for EVSE Installations at MUDs</u></p> <p>The JMP urged the Commission to focus site selection around MuDs, given that the availability of at-home charging would have a greater impact on encouraging EV adoption than workplace charging, and MuDs are currently underserved by the EVSE market. Further, we noted the discrepancy in the Proposed Decision between the AVP terms that required a 50% distribution of EVSE at MuDs, and the specifically stated number of 150 site installations for MuDs, which was below the 175 sites that would constitute 50%. We recommended that because of the greater difficulties for MuDs to participate in the AVP, the state of the currently underserved MuD market, and the utility's role in this program to encourage EV adoption in essential markets, the discrepancy should be resolved to hold to a 50% goal.</p> <p>The JMP also responded to SDG&E objections to any MuD quota. The JMP pointed out that the purpose of the pilot is to gain data on how the market responds to the availability of EVSE, but if there is insufficient variety in siting and billing options, the</p>	<p>JMP OP at 13.</p> <p><i>Opening Comments of the Joint Minority Parties on the Proposed Decision of ALJ Wong Regarding Underlying Vehicle Grid Integration Application and Motion to Adopt Settlement Agreement (1/12/2016)</i> (JMP on PD) at 14, 15.</p> <p><i>Reply of the Joint Minority Parties to Opening Comments on the Proposed Decision of ALJ Wong (1/19/2016)</i> (JMP Reply on PD) at 3.</p> <p>Decision at 134.</p>	<p>Verified.</p>

<p>data will not be useful in selecting effective aspects for future programs.</p> <p>The Decision adopted a program term setting a target of approximately 50% of sites at MuDs.</p>		
<p><u>Exemption of CARE Customers from Cost Recovery.</u></p> <p>Early on and consistently throughout the proceeding, the JMP argued for special consideration in cost recovery from low-income ratepayers. We supported and highlighted similar recommendations by other intervenors, and provided grassroots insight justifying the exemption, arguing that low-income ratepayers are less interested or able to purchase EVs in response to more available EVSE, and will benefit less from the proposed programs. Especially CARE customers, who already need assistance paying their utility bills, would be unable to afford a new car, and would be easy to identify for cost exemption.</p> <p>We defended a CARE exemption against SDG&E's contention that excluding CARE customers from cost recovery would be an impermissible subsidy and illegal modification of the CARE discount rate.</p> <p>The Decision notes our recommendations and acknowledges the</p>	<p>JMP Comments on Settlement at 4, 5.</p> <p>JMP Reply on Settlement at 2, 3.</p> <p>JMP Opening Brief at 17.</p> <p>JMP Reply on PD at 4, 5.</p> <p>Decision at 156, 157, 158.</p>	<p>Verified.</p>

<p>persuasiveness of our argument that low-income ratepayers are unlikely to own EVs and use the EVSE. The AVP includes an exemption for CARE customers from cost recovery.</p>		
<p><u>DAC Site Selection Based on CES Score and EV Adoption Programs</u></p> <p>The JMP called for more specificity in using the CalEnviroScreen tool (CES) to select and prioritize DACs for EVSE siting. We pointed out that SDG&E consistently proposed only the vague provision that they would select from DACs “identified” by the CES, which would in effect let them chose from any of the 8000 census tracts identified in the tool. Furthermore, we highlighted that the proposed principles for general site selection did not take into account environmental or economic needs of any locations. We urged the Commission to prioritize the most heavily pollution-burdened and economically disadvantaged communities, which would have the highest CES scores.</p> <p>We also pushed for more specificity on how the program would “compliment” existing EV adoption programs, and recommended that site selection priority be given to DACs that already participate in EV adoption programs, to support existing efforts to increase access to</p>	<p>JMP Comment on Settlement at 5, 6, 7, 9, 10.</p> <p>JMP OP at 11, 19, 20, 21.</p> <p>JMP Reply Brief at 11.</p> <p>JMP Reply on PD at 5.</p> <p>Decision at 67, 136, 137, 138.</p>	<p>Verified.</p>

EVs. The Decision required DACs to be selected from among those areas with CES scores in the highest quartile, and incorporated principles that prioritized areas with higher pollution, which could most benefit from EVSE deployment and the anticipated increase in EV adoption, and which were participating in existing EV adoption programs.		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	Yes	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified.
c. If so, provide name of other parties: ORA, TURN		Agreed.
d. Intervenor's claim of non-duplication: ORA and TURN represent ratepayer interests generally, and as such, their positions aligned with those of the JMP on certain issues. Throughout the proceeding, the JMP made efforts to communicate and coordinate with other ratepayer advocates to avoid duplication, and jointly filed when it was appropriate. However, the other ratepayer advocates do not represent the same minority communities as the JMP, and do not have the same direct grassroots involvement in those communities. Their arguments, even for the same outcomes, are not based on the same understanding and expertise gained from actual ratepayer experience and input. The JMP contributes a unique perspective on the needs of the minority community, obtained from providing direct services to their constituencies, which helps inform and lend credibility to Commission decisions. Therefore, while other parties may have had positions that were similar to the JMP, our perspectives and goals were necessarily different, and were supplemented, not duplicated, by efforts on common issues.		Verified. The Commission agrees that NAAC did not engage in duplicative efforts.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
<p>The NAAC's advocacy efforts reflected in D.16-01-045 addressed matters related to rejecting the inadequate Proposed Settlement, reducing the size, cost, and duration of the program to levels appropriate for a pilot, effectively including MuDs in site selection, exempting CARE customers from cost recovery, and developing appropriate criteria for DAC selection. Our contribution on these issues helped to craft a program that would reduce overall cost and risk to ratepayers, better test program assumptions, generate more useful information for future programs, and encourage environmental and economic improvement in disadvantaged communities.</p> <p>For the most part, the NAAC cannot identify an exact monetary value for the benefits of these advocacy efforts, given the nature of the issues presented, and the fact that the AVP pilot has yet to be fully implemented. However, ratepayers greatly benefited from our efforts to focus the AVP program and savings will result both from reduced direct costs, as well as more effective future programs based on the results.</p>	<p>Verified.</p>
<p>b. Reasonableness of hours claimed:</p> <p>This claim for compensation includes 325.2 total hours for NAAC attorneys and experts. The NAAC submits that this is a reasonable amount of time, given the duration of the proceeding, the breadth of issues examined, and the robust analysis and arguments over the proposed settlement and final provisions included in the decision. These hours were devoted to discussion and analysis, research, briefing, negotiations, and procedural matters.</p> <p>Hours submitted on this claim do not include hours spent on Phase 1 of the proceeding. However, as Part III, section C, Item 2 of D.15-10-006 on our compensation claim for Phase 1 indicated, some work done in 2014 submitted with our previous claim pertained to work now resolved by final decision D.16-01-045. As directed, some 2014 hours are being resubmitted in this claim.</p> <p>The main bulk of the work was handled by General Counsel Robert Gnaizda and Senior Attorney Tadashi Gondai. Attorney Jessica Tam provided support early on through research and coordination with other parties, reducing time that would have been spent by Mr. Gnaizda, and would have been billed at his higher rate. Her involvement was an economical and efficient use of resources.</p>	<p>Verified, but <i>see</i> CPUC Disallowances and Adjustments, below.</p>

<p>NAAC President and CEO Faith Bautista was an integral part of the case, due to her expertise in community marketing, education and outreach, and with her grassroots connection to the members in the minority community. Through her network of contacts and involvement in direct services, she was able to draw together a diverse coalition of parties to identify and advocate for the needs and concerns of the communities that will be affected by this decision. Through her expertise and input, the parties were better able to developed provisions that address the financial and social barriers to EV adoption in low-income communities.</p> <p>Michael Philips is an expert who has consulted in numerous utility cases before the CPUC for more than a decade, for both Greenlining and the NAAC. He has provided testimony on a variety of regulatory matters, including minority outreach, environmental, and compensation issues. The claim for his hours is reasonable, as his input was used only for specific guidance in surveying the community to better identify and advocate for ratepayer interests.</p> <p>NAAC submits that the recorded hours are reasonable, both for each attorney and expert, and in the aggregate. Therefore, NAAC seeks compensation for all of the hours recorded by our attorneys and experts as stated in this claim.</p> <p><u>Compensation Request Preparation Time:</u> NAAC is requesting compensation for approximately 15 hours devoted to the preparation of this request. This number of hours is reasonable in light of the fact that this was an active and lengthy proceeding, with a voluminous amount of materials to review.</p> <p>In order to save on costs, Mr. Gondai was solely responsible for drafting this claim. Mr. Gondai reviewed timesheets, e-mails, filings, testimony, settlement proposals, and decisions in order to properly allocate time by issue. He also reviewed I-Comp claim procedures and decisions to determine what work could be appropriately claimed, and omit hours spent on work that was beyond the scope, or exceeded normal time allotments for similar activities.</p> <p>The Commission should find that the hours claimed are reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>The attached timesheets (Attachment 3) indicate hours spent addressing separate issues identified according to the following codes:</p> <p>Preparation (PREP) - 12.5%: time and effort not tied to specific</p>	<p>Verified.</p>

<p>issues, but were nonetheless essential to effective participation, such as reviewing other party briefings, and discussing case strategy for filings and negotiations.</p> <p>Procedural (PROC) - 10.5%: time and effort spent addressing procedural matters, such as motions to consolidate, and applying proper rules of procedure in filings.</p> <p>Coordination (COOR) - 3.6%: time and effort to work and cooperate with other parties.</p> <p>Settlement (SETL) - 12.2%: time and effort spent negotiating and analyzing the settlement, which was also necessary in presenting arguments against adopting the inadequate settlement.</p> <p>Cost and Size (COST) - 28.0%: advocacy and research on appropriate program cost, size, scope, and reasonable cost exemptions for low-income ratepayers.</p> <p>Site Selection Provisions (SITE) - 33.2%: advocacy and research pertaining to the development of appropriate and reasonable provisions for site selection, including MUD quota and prioritization of DACs.</p> <p>PREP - 12.5% PROC - 10.5% COOR - 3.6% SETL - 12.2% COST - 28.0% SITE - 33.2% Total: 100%</p>	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hour s	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Robert Gnaizda	2014	16.1	\$570	D.15-10-006	\$9,177	16.10	\$570.00	\$9,177.00
Robert Gnaizda	2015	103.9	\$570	D.15-10-006 Resolution ALJ-308	\$59,223	103.90	\$570.00	\$59,223.00
Jessica Tam	2015	9.8	\$165	D.15-10-006, Resolution ALJ-308	\$1,617	9.80	\$165.00	\$1,617.00
Tadashi	2015	127.7	\$275	see Comment	\$35,117.50	127.70	\$225.00	\$28,732.50

Gondai				A			[1]	
Tadashi Gondai	2016	47.7	\$300	See Comment B	\$14,310	47.70	\$230.00 See Res. ALJ 329	\$10,971.00
Faith Bautista	2014	0.2	\$165	D.15-06-024	\$33	0.20	\$165.00	\$33.00
Faith Bautista	2015	14.6	\$165	D.15-06-024 Resolution ALJ-308	\$2,409	14.60	\$165.00	\$2,409.00
Faith Bautista	2016	1.8	\$165	D.15-06-024 Resolution ALJ-308	\$297	1.80	\$165.00 See Res. ALJ 329	\$297.00
Michael Phillips	2015	3.4	\$405	D.15-10-006, Resolution ALJ-308	\$1,377	3.40	\$405.00	\$1,377.00
Subtotal: \$ 123,560.50						Subtotal: \$ 113,836.50		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Travel – Tadashi Gondai	2015	1	\$137.5	\$275/2 see Comment A	\$137.50	00.00	N/A	00.00
Travel – Tadashi Gondai	2016	1	\$150	\$300/2 see Comment B	\$150	00.00	N/A	00.00
Subtotal: \$ 287.5						Subtotal: \$00.00 [2]		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Tadashi Gondai	2016	15	\$150	\$300/2 see Comment B	\$2,250	15.00	\$115.00	1,725.00
Subtotal: \$ 2250						Subtotal: \$1,725.00		
COSTS								
#	Item	Detail			Amount	Amount		
	Printing	Printing costs for drafts and			\$20.00	\$20.00		

		reviews of filings, as well as to review filings from other parties and the Commission		
TOTAL REQUEST: \$126,118				TOTAL AWARD: \$115,581.50
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR¹	Member Number	Actions Affecting Eligibility (Yes/No?)	
Robert Gnaizda	Jan. 9, 1962	32148	No	
Tadashi Gondai	Dec. 3, 2010	273186	No	
Jessica Tam	June 01, 2014	296837	No	

C. Intervenor's Comments on Part III:

Comment #	NAAC's Comment(s)
Comment A	<p>The Commission has not awarded an hourly rate for Tadashi Gondai in the past. Mr. Gondai was admitted to the CA Bar in Dec 2010 and had approximately four and a half years of experience as a licensed attorney when he began work on this proceeding, and attained five years of experience in Dec 2015. Mr. Gondai's considerable experience developing public policy and advocating for minority and disadvantaged communities greatly informs his work before the CPUC. His resume is included in attachment 2.</p> <p>Resolution ALJ-308 adopted a 2015 hourly range of \$215-\$250 for attorneys with 3-4 years of experience, and \$300-\$320 for attorneys with 5-7 years. Mr. Gondai had between 4 and 5 years of experience while he worked on this case in 2015, and so his hourly rate should fall between \$250-\$300</p> <p>Based on the above, the NAAC requests a 2015 hourly rate for Mr. Gondai of \$275.</p>

¹ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Comment B	<p>The Commission has not awarded an hourly rate for Tadashi Gondai in the past. Mr. Gondai was admitted to the CA Bar in Dec 2010 and had over five years of experience as a licensed attorney when he worked on this proceeding in 2016, including 8 months of work on proceedings before the CPUC in 2015. Mr. Gondai's considerable experience developing public policy and advocating for minority and disadvantaged communities greatly informs his work before the CPUC. His resume is included in attachment 2.</p> <p>Resolution ALJ-308 adopted a 2015 hourly range of \$300-\$320 for attorneys with 5-7 years of experience.</p> <p>Based on the above, the NAAC requests a 2016 hourly rate for Mr. Gondai of \$300.</p>
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D. CPUC Disallowances and Adjustments:

Item	Reason
[A]	The Commission applied the 1.28% cost-of-living adjustment (COLA), adopted in Res. ALJ-329, to all 2016 rates
[1]	Mr. Gondai possesses approximately 2.5 years of relevant work experience, related to practice before the Public Utilities Commission. We find that a rate of \$225 is reasonable for Gondai's work in 2015.
[2]	The Commission does not compensate for travel that is routine, which is defined as travel under 90 miles. Gondai's travel time is routine and not compensable.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes.

FINDINGS OF FACT

1. The National Asian American Coalition has made a substantial contribution to D.16-01-045.
2. The requested hourly rates for The National Asian American Coalition's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$115,581.50.

CONCLUSION OF LAW

The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The National Asian American Coalition shall be awarded \$115,581.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay the amount awarded to the National Asian American Coalition. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 18, 2016, the 75th day after the filing of The National Asian American Coalition's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.
5. Application 14-04-014 is closed. Rulemaking 13-11-007 remains open.

Dated June 23, 2016, at San Francisco, California.

MICHAEL PICKER

President

MICHEL PETER FLORIO

CATHERINE J.K. SANDOVAL

CARLA J. PETERMAN

LIANE M. RANDOLPH

Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D1606050	Modifies Decision?	No
Contribution Decision(s):	D1601045		
Proceeding(s):	A1404014		
Author:	ALJ Wong		
Payer(s):	San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The National Asian American Coalition (NAAC)	4/4/16	\$126,118.00	\$115,581.50	N/A	See CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Robert	Gnaizda	Attorney	NAAC	\$570	2014	\$570.00
Robert	Gnaizda	Attorney	NAAC	\$570	2015	\$570.00
Jessica	Tam	Attorney	NAAC	\$165	2015	\$165.00
Tadashi	Gondai	Attorney	NAAC	\$275	2015	\$225.00
Tadashi	Gondai	Attorney	NAAC	\$300	2016	\$230.00
Faith	Bautista	Advocate	NAAC	\$165	2014	\$165.00
Faith	Bautista	Advocate	NAAC	\$165	2015	\$165.00
Faith	Bautista	Advocate	NAAC	\$165	2016	\$165.00
Michael	Phillips	Expert	NAAC	\$405	2015	\$405.00

(END OF APPENDIX)